

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,<sup>1</sup>

Debtors.

FTX TRADING LTD. and MACLAURIN  
INVESTMENTS LTD.,

Plaintiffs,

-against-

LOREM IPSUM UG, PATRICK GRUHN,  
ROBIN MATZKE, and BRANDON  
WILLIAMS,

Defendants.

**MOTION BY DEFENDANTS LOREM IPSUM UG,  
PATRICK GRUHN, AND ROBIN MATZKE’S FOR LEAVE TO EXCEED  
PAGE LIMITATION WITH RESPECT TO THEIR MOTION TO DISMISS**

Defendants Lorem Ipsum UG, Patrick Gruhn, and Robin Matzke (“**LI Defendants**”)

hereby move (this “**Motion to Exceed**”) this Court for entry of an order, substantially in the form attached hereto as **Exhibit A**, authorizing the LI Defendants, pursuant to Rules 1001-1 and 7007-2 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court

<sup>1</sup> The last four digits of FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

for the District of Delaware (as amended, “**Local Rules**”), to exceed certain page limits. Specifically, the LI Defendants seek to exceed the thirty (30) page limit applicable to opening briefs under Local Rule 7007-2 for the LI Defendants’ opening brief (“**Opening Brief**”) in support of their motion for dismiss (“**MTD**”). In support of the relief requested in this Motion to Exceed, the LI Defendants respectfully state as follows:

### **Jurisdiction**

1. This Court has jurisdiction to consider this Motion to Exceed pursuant to 28 U.S.C. § 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2), and venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.

2. The bases for the relief requested in this Motion to Exceed are Local Rules 1001-1 and 7007-2.

### **Relief Requested**

3. By this Motion to Exceed, the LI Defendants request authority to exceed the thirty (30) page limit for their Opening Brief by an additional ten (10) pages, for a total of forty (40) pages.

### **Basis for Relief**

4. Local Rule 7007-2(a)(iv) provides that “[w]ithout leave of Court, no opening or answering brief shall exceed thirty (30) pages . . . , in each instance, exclusive of any tables of contents and citations.” Del. Bankr. LR 7007-2(a)(iv). Local Rule 1001-1(c) provides that “[t]he application of these Local Rules in any case or proceeding may be modified by the Court in the interest of justice.” Del. Bankr. LR 1001-1(c).

5. The Opening Brief is presented in further support of the Defendants’ MTD and addresses numerous issues in support of the relief requested. Due to the complexity of the matters

related to these cases, and the numerous factually and legally complex issues in the MTD, as well as the fact that the MTD is filed on behalf of three defendants, the LI Defendants request leave from the page limitations applicable to opening briefs. This will allow the LI Defendants to fairly, completely, and efficiently present to the Court their arguments related to the MTD and any opposition thereto.

6. Counsel to the LI Defendants conferred with counsel to the Plaintiffs in advance of filing this Motion to Exceed, and Plaintiffs have advised that they do not object to the requested relief.

*[Text Continues on Following Page]*

WHEREFORE, for all the reasons set forth above, the LI Defendants respectfully request that this Court enter an order authorizing them to exceed the thirty (30) page limit under Local Rule 7007-2 with respect to the Opening Brief by an additional ten (10) pages, and granting such other and further relief as the Court may deem just and proper under the circumstances.

Dated: October 25, 2023  
Wilmington, Delaware

/s/ Laura Davis Jones

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